



May 17, 2006

BY HAND-DELIVERY

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station
Boston, MA 02110

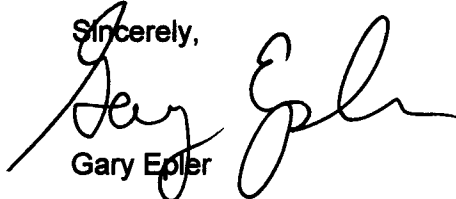
Re: Petition of Bay State Gas Company, Pursuant to 220C.M.R. § 1.04(5),
for approval by the Department of Telecommunications and Energy
of a proposal to implement an incremental capacity planning standard
for grandfathered customers and approval of related modifications to
Bay State Gas Company tariffs M.D.T.E. No. 35, Distribution and
Default Service Terms and Conditions, and M.D.T.E. No. 36, Cost of
Gas Adjustment Clause. D.T.E. 06-36

Dear Secretary Cottrell:

Enclosed for filing please find the original and two copies of Fitchburg
Gas and Electric Company's ("FG&E") Petition to Intervene in the above-
captioned filing. Also enclosed are an original and two copies of a Motion for
Admission Pro Hac Vice on behalf of the undersigned counsel. Copies of the
Petition and Motion are also being provided as directed in the Notice of Filing.

Thank you for your attention to this matter.

Sincerely,



Gary Epler

Enclosure

cc: John Cope-Flanagan, Hearing Officer
Julie Howley Westwater, MDTE
George Yiankos, Director, Gas Division, MDTE
Andreas Thanos, Assistant Director, Gas Division, MDTE
Cynthia Bradbury, MDTE
Rebecca Hanson, MDTE
Colleen McConnell, Assistant Attorney General
Patricia M. French, Esq.
Robert L. Dewees, Jr., Esq.

Gary Epler
Senior Counsel

6 Liberty Lane West
Hampton, NH 03842-1720

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Email: epler@unitil.com

**COMMONWEALTH OF MASSACHUSETTS
BEFORE THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Bay State Gas Company, Pursuant to
220C.M.R. § 1.04(5), for approval by the
Department of Telecommunications and Energy
of a proposal to implement an incremental
capacity planning standard for grandfathered
customers and approval of related modifications
to Bay State Gas Company tariffs M.D.T.E. No.
35, Distribution and Default Service Terms and
Conditions, and M.D.T.E. No. 36, Cost of Gas
Adjustment Clause.

D.T.E. 06-36

**PETITION TO INTERVENE ON BEHALF OF
FITCHBURG GAS AND ELECTRIC LIGHT COMPANY**

Pursuant to 220 CMR 1.03, Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil") hereby petitions the Department of Telecommunications and Energy ("Department") for leave to intervene and participate in the above captioned proceeding. In support of its request, FG&E states the following:

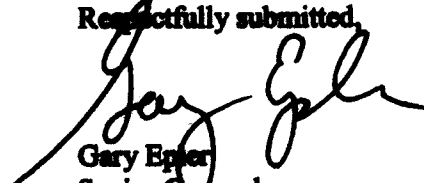
1. Unitil is a "Local Distribution Company" as defined in 220 CMR §14.02, and, pursuant to 220 CMR § 14.03(2), has the exclusive obligation to provide gas distribution service to all customers within its service territory.
2. In conducting adjudicatory hearing, the Department may "allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose, as the agency may order." See G.L. c. 30A § 10; 220 CMR 1.03(1)(b).
3. The Notice issued by the Department in this proceeding states that, among other things, this proceeding will investigate whether Bay State Gas Company should implement an incremental planning standard into its resource planning process, whereby 30 percent of grandfathered customer loads would be included in its forecasted requirements. Bay State also seeks approval of changes to its nomination and balancing protocols reflected in its Default Service tariff's Terms and Conditions that would allow the Company to monitor more closely the potential for unauthorized overtake by grandfathered customers.

4. As a local distribution company providing gas distribution service to customers in Massachusetts, Unitil submits that it may be substantially and specifically affected by the outcome of this proceeding.
5. Unitil requests that all notices, testimony, pleadings and correspondence pertaining to these proceedings be directed to:

Gary Epler
Unitil Service Corp.
6 Liberty Lane West
Hampton, NH 03842
(603) 773-6440
(603) 773-6640 (fax)
epeler@unitil.com

On the basis of the foregoing, respectfully requests leave to participate in this proceeding as an intervenor.

Respectfully submitted,



Gary Epler
Senior Counsel
Unitil Service Corp.
6 Liberty Lane West
Hampton, NH 03842

Date: May 11, 2006

Certificate of Service

I certify that copies of this Petition to Intervene have been served this 11th day of May, 2006 by Overnight Express Mail upon counsel for Bay State Gas Company and the Massachusetts Office of the Attorney General.



Gary Epler

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Bay State Gas Company, Pursuant to
220C.M.R. § 1.04(5), for approval by the
Department of Telecommunications and Energy
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D.T.E. 06-36

MOTION FOR ADMISSION PRO HAC VICE

The undersigned counsel for Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil"), Gary Michael Epler, hereby moves for admission pro hac vice in the above captioned proceeding before the Massachusetts Department of Telecommunications and Energy ("Department"), pursuant to 220 CMR 1.02 and 801 CMR 1.01. In support of this motion, Mr. Epler states as follows:

1. Mr. Epler is employed as Senior Counsel by Unitil Service Corp., 6 Liberty Lane West, Hampton, New Hampshire, 03842.
2. Mr. Epler is a member in good standing of the New Hampshire, New Jersey, New Mexico (in-active status) and New York bars and is currently admitted to practice before the New Hampshire, New Jersey, New Mexico and New York state courts, the federal district courts located in each of these states, as well as the federal 1st, 2nd, 3rd, 10th and District of Columbia Courts of Appeals. Mr. Epler is not currently and has never been suspended or disbarred in any jurisdiction and there are no disciplinary proceedings pending against him in any jurisdiction. He is familiar with the facts of this

proceeding for which Unitil shall appear before the Department and agrees to adhere to the Department's rules and orders, and applicable agreements between the parties.

WHEREFORE, Mr. Epler respectfully requests that the Department permit him to appear pro hac vice for the purpose of representing Unitil in this proceeding, and requests further that this motion be deemed to satisfy the requirement of 220 CMR 1.02(7) regarding the filing of an Appearance.

Dated: May 11, 2006


Respectfully submitted,



Gary Epler
Senior Counsel
Unitil Service Corp
6 Liberty Lane West
Hampton, NH 03842
(603) 773-6440
epler@unitil.com

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Gary Epler